

From: Mr. Robert L. Dickerson, Father and Court Appointed Guardian  
for Brandon R. Dickerson  
29 Seymour Lane, Medford New York 11763  
Phone: 347-530-5466. Email: [roblawdickerson@gmail.com](mailto:roblawdickerson@gmail.com)

To: The United States District Court for the Eastern District of New York

Att: **Hon. Eric Komitee**

**Subject: Response to defense counsel's letter**

September 11<sup>th</sup>, 2023

Dear Justice Komitee:

In response to Mr. Mazloumi's attorney's letter, I respectfully submit to Your Honor that a conspiracy between Justice Bernice D. Siegal, a state actor, Mr. Mazloumi and others, has in fact occurred and continues to unfold unabated, to defraud me from my Due Process Civil Rights.

The United States Supreme Court has held in *Adickes v. S.H. Kress & Co.* the involvement of a state official in such a conspiracy would plainly provide the state action necessary for a section 1983 claim.

*Ciambriello v. County of Nassau,*

"Section 1983 claims may be brought where a private actor conspired with a state actor to deprive the individual of their rights. *Ciambriello v. County of Nassau*, 292 F.3d 307, 324 (2d Cir. 2002)

*Adickes v. S.H. Kress & Co.*

"[A] private actor acts under color of state law when the private actor 'is a willful participant in joint activity with the State or its agents.'" ( *Adickes v. S.H. Kress & Co.*, 398 U.S. 144, 152 (1970).

In this Matter, the offense is conspiracy to deprive me of my Constitutional Civil Rights under Color of Law pursuant to the Due Process Clause, U.S.C. 42 sec. 1983. The defendant(s) conspired with the goal to steal jurisdictional authority of Guardianship over my son, Brandon Dickerson, an incapacitated person.

**The state Actor:** Defendant Judge Bernice D. Siegal.

**Private Actor(s):** Defendant Abraham Mazloumi, Petitioner Geneva Dickerson, petitioner's attorney Judah Schwartz

**“Modus Operandi”:** Circumvent and disregard the lawful Court Order(s) of Justice E. Adrian Adams of the 24<sup>th</sup> District Court, Parish of Jefferson State of Louisiana, commence unlawful MHL Article 81 petition in “complete absence of all jurisdiction” to confuse the judicial process, remove the lawful guardian, Mr. Robert L. Dickerson and replace him with temporary guardian, the defendant, Abraham Mazloumi.

I respectfully submit to Your Honor that my Civil Rights Complaint is not a complaint containing only conclusory, vague, or general allegations of conspiracy. The Complaint indeed contains detailed and factual events of a conspiracy to circumvent lawful Court Order(s), an event that has actually occurred and continues unabated, demonstrating the defendant(s) relentless goal to deprive me of my constitutional rights under the Due Process Clause of the 14<sup>th</sup> Amendment.

The mere fact that Judge Siegal has failed to give any response in this Matter resulting in an application for a Default Judgment speaks volumes, presumably because as a sitting jurist, she fears no consequences of her actions.

I further respectfully submit to Your Honor that I desire not to waste this Court's valuable resources and time on a matter that can be resolved equitably and expeditiously. And that is simply for the defendant(s) to respect, Honor and obey the October 25<sup>th</sup>, 2022 Final Judgment and Decree of Justice E. Adrian Adams of the Louisiana 24<sup>th</sup> District Court.

Thank you.

*Mr. Robert L. Dickerson*

Mr. Robert L. Dickerson

Cc:

William F. Dahill email: [wdahill@cwdlaw.com](mailto:wdahill@cwdlaw.com)